

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

---

SCOTT TURNAGE, CORTEZ D. BROWN,  
DEONTAE TATE, JEREMY S. MELTON, ISSACCA  
POWELL, KEITH BURGESS, TRAVIS BOYD,  
TERRENCE DRAIN and KIMBERLY ALLEN  
on behalf of themselves and all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity as former  
Sheriff of Shelby County, Tennessee; FLOYD BONNER,  
JR., in his official capacity as the Sheriff of Shelby County,  
Tennessee; ROBERT MOORE, in his individual capacity  
as former Jail Director of Shelby County, Tennessee;  
KIRK FIELDS, in his official capacity as the Jail Director  
of Shelby County, Tennessee; CHARLENE MCGHEE, in  
her individual capacity as former Assistant Chief of Jail  
Security of Shelby County, Tennessee; REGINALD  
HUBBARD, in his official capacity as Assistant Chief of  
Jail Security of Shelby County, Tennessee; DEBRA  
HAMMONS, in her individual capacity as former Assistant  
Chief of Jail Programs; TIFFANY WARD in her official  
capacity as the Assistant Chief of Jail Programs of Shelby  
County, Tennessee; SHELBY COUNTY, TENNESSEE,  
a Tennessee municipality; TYLER TECHNOLOGIES,  
INC., a foreign corporation; GLOBAL TEL\*LINK  
CORPORATION, a foreign corporation; SOFTWARE  
AG USA, INC., a foreign corporation; SIERRA-CEDAR,  
INC., a foreign corporation; SIERRA SYSTEMS GROUP,  
INC., a foreign corporation, and TETRUS CORP, a foreign  
Corporation,

Defendants.

Civil Action No. 2:16-cv-02907-  
SHM-tmp

Jury Demanded

---

**NOTICE TO TAKE THE DEPOSITION OF TERRENCE DRAIN**

---

TO: **Terrence Drain**

c/o Frank L. Watson  
William F. Burns  
Watson Burns, PLLC  
253 Adams Avenue  
Memphis, TN 38104  
[fwatson@watsonburns.com](mailto:fwatson@watsonburns.com)  
[bburns@watsonburns.com](mailto:bburns@watsonburns.com)

c/o Michael G. McLaren  
William E. Cochran, Jr.  
Brice M. Timmons  
Black McLaren Jones Ryland & Griffie PC  
530 Oak Court Drive, Suite 360  
Memphis, TN 38117  
[MMcLaren@blackmclaw.com](mailto:MMcLaren@blackmclaw.com)  
[wcochran@blackmclaw.com](mailto:wcochran@blackmclaw.com)  
[btimmons@blackmclaw.com](mailto:btimmons@blackmclaw.com)

Pursuant to Federal Rule of Civil Procedure 30(a)(1), Defendants Shelby County, Tennessee, Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons, Floyd Bonner, Jr., Kirk Fields, Reginald Hubbard, Tiffany Ward (collectively “Shelby County Defendants”), Tyler Technologies, Inc., Global Tel\*Link Corporation, Software AG USA, Inc., Sierra-Cedar, Inc., Sierra Systems Group, Inc., and Tetras Corp. will take the deposition of **Terrence Drain at Wyatt, Tarrant & Combs, LLP, 6070 Poplar, Suite 300, Memphis, TN 38119 on Thursday, January 30, 2020 at 1:30 p.m. (CST)** and continuing until such time as completed.

The testimony shall be recorded by a certified court reporter by stenographic, audio, electronic and/or other means. The deposition may be recorded by video or other visual and electronic means. The deposition shall be taken before a notary public or other officer authorized by law to administer oaths.

The deposition is for class certification discovery. It may be used as evidence and for all other purposes authorized by law.

Respectfully submitted,

/s/ Odell Horton, Jr.  
Robert E. Craddock, Jr. (#5826)  
Odell Horton, Jr. (# 12426)  
Byron Brown (#23529)  
Meghan Cox (#33028)  
Wyatt Tarrant & Combs, LLP  
6070 Poplar Ave., Suite 300

Memphis, TN 38119  
(901) 537-1000  
rcraddock@wyattfirm.com  
ohorton@wyattfirm.com  
bbrown@wyattfirm.com  
mcox@wyattfirm.com

AND

E. Lee Whitwell (#33622)  
Shelby County Attorney's Office  
160 North Main Street, Suite 950  
Memphis, TN 38103  
(901) 222-2100  
lee.whitwell@shelbycountyttn.gov

*Counsel for Defendants Shelby County, Tennessee,  
Bill Oldham, Robert Moore, Charlene McGhee,  
Debra Hammons, Floyd Bonner, Jr., Kirk Fields,  
Reginald Hubbard and Tiffany Ward*

**CERTIFICATE OF SERVICE**

I certify that the foregoing is being filed via the Court's ECF system this 6<sup>th</sup> day of December, 2019, for service on all persons registered in connection with this case, including:

Michael G. McLaren  
William E. Cochran, Jr.  
Brice M. Timmons  
Black McLaren Jones Ryland & Griffie PC  
530 Oak Court Drive, Suite 360  
Memphis, TN 38117  
MMcLaren@blackmclaw.com  
wcochran@blackmclaw.com  
btimmons@blackmclaw.com

Frank L. Watson  
William F. Burns  
Watson Burns, PLLC  
253 Adams Avenue  
Memphis, TN 38104  
fwatson@watsonburns.com  
bburns@watsonburns.com

*Counsel for Plaintiffs*

Bradley E. Trammell  
Baker, Donelson, Bearman, Caldwell & Berkowitz  
165 Madison Avenue, Suite 2000  
Memphis, TN 38103  
btrammell@bakerdonelson.com

Beth Petronio  
K&L Gates  
1717 Main Street, Suite 2800  
Dallas, Texas 75201  
beth.petronio@klgates.com

*Counsel for Tyler Technologies, Inc.*

Russell Brandon Bundren  
James L. Murphy  
Bradley Arant Boult Cummings LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
bbundren@babco.com  
jmurphy@bradley.com

*Counsel for Defendant Global TelLink Corporation*

Kevin David Bernstein  
Albert G. McLean  
Spicer Rudstrom PLLC  
119 S. Main Street, Suite 700  
Memphis, TN 38103  
kdb@spicerfirm.com  
amclean@spicerfirm.com

*Counsel for Defendant Sierra-Cedar, Inc.*

Douglas F. Halijan  
William David Irvine  
Burch Porter & Johnson  
130 N. Court Avenue  
Memphis, TN 38103-2217  
dhalijan@bpjlaw.com  
wirvine@bpjlaw.com

*Counsel for Defendant Software AG  
USA, Inc.*

Heather Gwinn-Pabon  
Erin McDaniel  
Gordon Rees Scully Mansukhani, LLP  
3401 Mallory Lane, Suite 120  
Franklin, TN 37067  
hgwinn@grsm.com

*Counsel for Defendant Sierra Systems Group, Inc.*

/s/ Odell Horton, Jr.